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September 6, 2024

VIA ELECTRONIC FILING

Hon. Christian F. Hummel, United States Magistrate Judge
U.S. District Court, NDNY
James T. Foley U.S. Courthouse
445 Broadway, 4th Floor
Albany, New York 12207

Re: *Tara Rule v. Braiman, et. al*
Case No.: 1:23-cv-1218 (BKS/CFH)

Dear Judge Hummel:

This office represents Defendants Albany Med Health System, Glens Falls Hospital, Malta Med Emergent Care, Saratoga Hospital, and Donna Kirker (collectively, "Entity and Kirker Defendants") in the above-referenced action. We write to request an extension of time to respond to Plaintiff Tara Rule's ("Plaintiff") Amended Complaint.

The Court issued its decision on the Entity and Kirker Defendants' Motion to Dismiss, as well as the motions to dismiss by the other individual defendants, on September 4, 2024. Per FRCP 12, the current deadline to respond to the Amended Complaint is September 18. The Amended Complaint is quite long, at 182 single-spaced pages, and additional time is necessary to provide an Answer to the Amended Complaint.

We have conferred with Plaintiff and all other defendants in the case. All defendants are also seeking an extension of time, to October 21, and Plaintiff does not oppose this request. We therefore respectfully request an extension of time for all defendants to respond to the Amended Complaint to October 21.

Thank you for your consideration.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

s/ Michael D. Billok
Bar Roll No. 516448

cc: All parties, via CM/ECF